March 18, 2015

## Filed Via ECF and Courtesy Copy Via Facsimile

The Honorable Laura Taylor Swain United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 - 1312 Chambers Fax: (212) 805-0426

Re: Anderson v. HotelsAB, et al., Civil Action No. 15-cv-00712(LTS)(JLC)

Dear Judge Swain:

We represent Plaintiff Karen Anderson and Defendants HotelsAB, LLC ("HotelsAB") and Andre Balazs Properties a/k/a The Beach House LLC (collectively, "Defendants") in the above-referenced matter.

We are writing to inform you that counsel for the parties consulted on March 16, 2015, and agreed to stay discovery while the Defendants' Motion to Dismiss, filed on March 10, 2015, is pending. The parties contemplate not exchanging initial disclosures or serving any other discovery until the Motion has been ruled upon. The parties are in agreement that such a stay is in the best interest of both parties and the Court given that the Motion to Dismiss, if granted, would dispose of the entire case as currently pled.

Accordingly, the parties respectfully request that the Court endorse this request to stay discovery without the necessity of a formal motion. The parties, however, will file a formal motion as the Court may direct.

Respectfully submitted,

Kenneth W. Taber

Pillsbury Winthrop Shaw Pittman LLP

1540 Broadway

New York, New York 10036

Lineth Tax

ph. (212) 858-1000

fax (212) 298-8405

kenneth.taber@pillsburylaw.com

George Vallas

The Ottinger Firm, P.C. 401 Park Avenue South

New York, New York 10016

ph. (212) 571 2000

fax (212) 571 0505

george@ottingerlaw.com

Defendant Andre Balazs does not join in this letter as he has not yet been served with the Summons and Complaint.